

MEMO ENDORSED

JEREMI L. CHYLINSKI
JCHYLINSKI@GRSM.COM

| |
|--------------------------------------|
| USDC SDNY |
| DOCUMENT |
| ELECTRONICALLY FILED |
| DOC #: _____ |
| DATE FILED: <u>10/05/2023</u> |

GORDON&REES
SCULLY MANSUKHANI

ATTORNEYS AT LAW
ONE BATTERY PARK PLAZA
NEW YORK, NEW YORK 10004
PHONE: (917) 650-0050
FAX: (212) 269-5505
WWW.GORDONREES.COM

October 4, 2023

By ECF

Hon. Katharine H. Parker
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Mirea et al v. Centennial Properties NY Inc. et al.
Case No. 1:23-CV-00769 (JHR) (KHP)

Judge Parker:

This firm represents Defendants Centennial Properties NY Inc. and Steven Croman in the above matter. We write with Plaintiffs' consent to respectfully request an adjournment to the October 5, 2023 in-person settlement conference. The reasons for this request are three-fold. First, the undersigned tested positive for covid-19 last night and earlier today. Second, as noted during the September 27, 2023 pre-settlement conference, Defendants have not responded to counsel's emails or phone calls regarding this matter, rendering continued representation unreasonably difficult. Counsel was hopeful that an eleventh hour plea would resolve this issue. It did not. Third, Defendants have failed substantially to respond to counsel's invoices for legal services, thereby creating an unreasonable financial burden.

For these reasons, counsel requests a two-week adjournment – until October 25, 2023 – or a date more convenient for Your Honor. Counsel is hopeful that the above issues will be resolved before October 25. And, if those issues are not resolved, the undersigned will seek leave to withdraw as counsel on or before October 18, 2023.

We thank Your Honor for your attention to this matter.

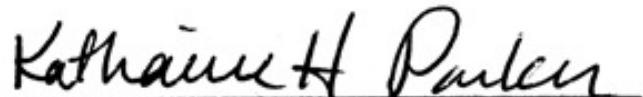
Respectfully Submitted,

s/ Jeremi L. Chylinski.
Jeremi L. Chylinski, Esq.

cc: All counsel of record via ECF

APPLICATION GRANTED: The settlement conference in this matter scheduled for Thursday, October 5, 2023 at 2:00 p.m. in Courtroom 17-D, United States Courthouse, 500 Pearl Street, New York, New York is hereby rescheduled to Monday, October 30, 2023 at 2:00 p.m. Parties must attend in-person with their counsel. Corporate parties must send the person with decision making authority to settle the matter to the conference. The parties are instructed to complete the Settlement Conference Summary Report and prepare pre-conference submissions in accordance with the Judge Parker's Individual Rules of Practice. Updated pre-conference submissions must be received by the Court no later than October 23, 2023 by 5:00 p.m.

APPLICATION GRANTED



Hon. Katharine H. Parker, U.S.M.J.

10/05/2023